

Exhibit QQ

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

Roger Parker,

Plaintiff,

v.

Perdue Foods LLC,

Defendant.

Case 5:22-cv-00268-TES

DECLARATION OF TODD ARLINE

I, Todd Arline, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the owner of and a broker for Arlyle Realty, Inc.
2. I was subpoenaed by Plaintiff Roger Parker in the above-captioned action against Perdue Foods, LLC (“Defendant” or “Perdue”).
3. I am a real estate broker specializing in the sale of poultry farms in the State of Georgia. I have over 20 years of experience representing sellers and buyers in the sale of poultry farms, including poultry farms that had a broiler contract with Perdue. Over the years, I have sold more than a dozen poultry farms that had broiler contracts with Perdue.
4. In 2019, I discussed entering into a listing agreement with Roger “Dale” Parker to list for sale the property located at 897 E. 24 Hwy, Milledgeville, GA. However, a final listing agreement was never entered, and I never listed the property for sale. I did take several steps to


assist Parker in preparing to sell the property, such as (for example) pulling the tax record card, touring the property, and reviewing the income statements Mr. Parker provided.

5. Parker informed me that Perdue required a number of upgrades to the farm before Perdue would agree to provide a new broiler contract for Perdue chickens to be grown at that farm. Parker provided me the list of upgrades Perdue would require, and it was an extensive list.

6. Based on my experience selling poultry farms, I believed it would be extremely difficult to find a buyer for Parker's property at or near the listing price I was going to suggest to Mr. Parker, if the buyer of the farm could not obtain a broiler contract for the growing of chickens at that location.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 4/29/2025


Arline Todd